

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

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SECURITIES AND EXCHANGE	:	
COMMISSION,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	Civil Action No. 1:21-cv-00260-PB
	:	
LBRY, INC.,	:	
	:	
Defendant.	:	
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DECLARATION OF JEREMY KAUFFMAN

I, Jeremy Kauffman, declare as follows:


1. Following Dr. Richard's deposition, I learned that LBRY's expert may not have been provided with the full universe of LBRY-affiliated wallet addresses, and that certain LBRY-associated addresses may not have been accounted for in Dr. Richard's original report. As a result, beginning in short order after Dr. Richard's deposition, I worked with my colleague, Alex Grintsvayg, to identify as many additional LBRY-owned wallet addresses as possible.

2. LBRY does not maintain the full list of all LBRY-affiliated wallet addresses created since the Company's inception in the ordinary course of business. Therefore, the process of identifying LBRY-owned wallet addresses is extremely laborious and time-intensive. In particular, it entails manually tracing token transfers over time.

3. LBRY is a small start-up company with limited resources, and the difficult process of identifying LBRY-owned wallet addresses took our team several weeks to complete.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 29th day of June, 2022.



Jeremy Kauffman